

April 21, 2014

**MEMORANDUM**

**SUBJECT:** CASAC Review of the Draft Integrated Review Plan (IRP) for the Primary National Ambient Air Quality Standard for Sulfur Dioxide: Written Comments on Chapter 7 of IRP

**FROM:** Jack R. Harkema, DVM, PhD, DACVP  
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**TO:** Diana Wong  
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EPA Science Advisory Board Staff Office

***Charge Question for Policy Assessment and Rulemaking (Chapter 7):*** To what extent does Chapter 7 clearly summarize the general process for the policy assessment and rulemaking phase of this review?

The purpose, plan and process of the Policy Assessment and Rulemaking in Chapter 7 are for the most part clearly and concisely articulated in Chapter 7. The authors, however, may consider providing a “Decision Tree” figure that summarizes the policy assessment process including key questions that will be addressed in the formulation of the final recommendation to the Administrator.

Specific Comments:

7.1 Policy Assessment. In general, the purpose and plan of the PA is clearly articulated in this section. Some examples of policy-relevant questions, however, could be added to the text. In addition, a summarizing figure (“decision tree”), outlining the processes of assessment and decision-making steps, would also be helpful to those who are formulating the final recommendation to the Administrator.

7.2 Rulemaking. The process is clearly and succinctly stated. On page 7-3, line 5, why is the length of the public comment period, “60 to 90 days”, so vague? Shouldn’t it be either 60 or 90 days?